

UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK

- - - - - x
UNITED STATES OF AMERICA :
 :
 - v - : **NOTICE OF MOTION**
 : **14 Cr. 666 (PAE)**
 MATTHEW VADO , :
 Defendant. :
 - - - - - x

PLEASE TAKE NOTICE, that on the attached Exhibits and Memorandum of Law, the undersigned will move this Court, before the Honorable Paul A. Engelmayer, United States District Judge for the Southern District of New York, at a time to be designated by the Court, for a ruling that his 2011 conviction for criminal sexual contact in the fourth degree, in violation of N.J. Stat. Ann. § 2C:14-3b, does not subject him to the enhanced penalty provisions of 18 U.S.C. §§ 2251(e), 2252A(b)(1), or 2252A(b)(2), and granting such further relief as this Court deems just and proper.

Dated: New York, New York
January 30, 2015

Respectfully submitted,
Federal Defenders of New York

/s/ Daniel Habib, Esq.
Attorney for Defendant

Matthew Vado

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